

Whistleblower Policy

1. Background and Purpose

Employees and others working closely with BBM Youth Support will often be the best source of information when things are not quite right. This Whistleblower Policy is an important element in detecting corrupt, illegal or other undesirable conduct at BBM Youth Support.

The purpose of this Policy is to:

- explain how to speak up by reporting concerns about wrongdoing;
- outline what protections a person who reports wrong doing will receive; and
- outline BBM Youth Support processes for dealing with reports of wrongdoing.

Creating a supportive environment where people feel safe to speak up underpins BBM Youth Support culture. When people do not speak up, this undermines the culture and exposes BBM Youth Support to risks. BBM Youth Support encourages speaking up about concerns of wrongdoing at BBM Youth Support.

There are various measures in place to ensure no one is discouraged from speaking up or disadvantaged or victimised for doing so.

This Policy covers the processes for dealing with disclosures made by employees and stakeholders of suspected improper conduct within BBM Youth Support in a confidential and secure manner and is intended to apply to whistleblowers in all countries in which BBM Youth Support operates.

BBM Youth Support is committed to the highest standards of conduct and ethical behaviour in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour, compliance and strong governance.

This policy is available on the website of BBM Youth Support.

2. Who may make a report

Anyone with information about potential wrongdoing relating to BBM Youth Support is encouraged to report their concerns under this Policy.

This includes individuals who are or have been in relation to BBM Youth Support:

- an employee, officer or contractor;
- a volunteer
- a scholar
- a youth migrant who came out to Australia through the historical Big Brother Movement
- a supplier of services or goods to BBM Youth Support (whether paid or unpaid) including their employees;

- a relative, dependent or spouse of any of the above individuals.

3. What to report

Any concerns of wrongdoing should be reported.

This means any misconduct or improper state of affairs or circumstances in relation to BBM Youth Support.

Examples of wrongdoing may include, but is not limited to:

- bullying, discrimination, physical abuse, neglect, sexual abuse, emotional abuse
- breach of laws or regulations;
- criminal activity including theft;
- serious breach of BBM Youth Support's Code of Conduct or Policies;
- offering or accepting a bribe;
- dishonest or unethical behaviour;
- conflicts of interest;
- anti-competitive behaviour;
- financial fraud or mismanagement including in relation to BBM Youth Support's tax affairs;
- falsifying financial or corporate reporting;
- insider trading;
- unauthorised use of BBM Youth Support's confidential information;
- improper use of Personal Information as described in any BBM Youth Support Privacy Statement;
- improper use of BBM Youth Support's physical or intellectual property;
- conduct endangering health and safety or causing damage to the environment; and
- deliberate concealment of any of the above.

There is an expectation that anyone reporting a wrongdoing has reasonable grounds to suspect the information they are disclosing is true, but there will be no penalty if the information turns out to be incorrect.

Those reporting are expected to provide the information upon which their suspicion is based, but are not required to have all the details or have conducted their own investigation.

Personal work related grievances are not within the scope of this Policy and will be addressed through the applicable grievance resolution process.

Personal work-related grievances relate to an employee's current or former employment and tend to have implications for them personally. Examples include:

- an interpersonal conflict between the employee and another employee;

- a concern about the behaviour of an employee;
- a decision relating to an employee's engagement, transfer or promotion;
- an employee's terms and conditions of employment;
- matters relating to an employee's performance or discipline - related decisions; or
- a decision relating to the termination of employment.

4. Who can disclosures be made to?

Disclosures can be made to:

- Compliance Officer & CEO - ceo@bbm.asn.au
- through BBM Youth Support's independent third party consultant, EAP Assist. All reports can be made on the EAP Assist website here <https://eapassist.com.au/whistleblower-program/> or contact EAP Assist on **0407086000**

Those not wanting to reveal their identity can make an anonymous report. However, providing the whistleblower's name when reporting wrongdoing will make it easier for BBM Youth Support to investigate the concern raised. For example the context in which wrongdoing was observed is likely to be useful information.

Where no name is provided, BBM Youth Support will assess the disclosure in the same way as if identity had been revealed, and any investigation will be conducted as best as possible in the circumstances. However, an investigation might not be possible unless sufficient information is provided.

Employees and stakeholders disclosing wrongdoing will be protected and the investigation will be conducted in accordance with the principles of fairness and justice.

5. Responsibility for Policy Compliance and Review

The CEO/Compliance Officer for BBM Youth Support is responsible for:

the overall administration of this Policy;

- monitoring the implementation of this Policy and reviewing on an ongoing basis the Policy's suitability and effectiveness.
- seeking to protect the whistleblower from detrimental conduct;
- assisting the whistleblower in maintaining wellbeing;
- maintaining whistleblower confidentiality, where relevant, including as required by law;
- reviewing and considering any complaints of detrimental conduct or any concern that disclosure has not been dealt with in accordance with this policy; and

6. Protecting a whistleblower's identity

- When reporting wrongdoing, the reporter's identity and any information that BBM Youth Support has as a result of the report that is likely to lead to identification, will only be disclosed if:
 - the person reporting gives consent for BBM Youth Support to disclose that information;
 - BBM Youth Support considers such disclosure should be made to:
 - the Australian Federal Police
 - a Commonwealth authority or a State or Territory authority for the purpose of assisting the authority perform its functions or duties;
 - a lawyer for legal advice or representation in relation to whistleblower laws;
 - or
 - in the case of information likely to identify the person reporting, it is reasonably necessary to disclose the information for the purposes of an investigation, and all reasonable steps are taken to prevent someone from discovering the reporter's identity.

7. Detrimental Conduct Prohibited

BBM Youth Support strictly prohibits all forms of detrimental conduct against whistleblowers.

Detrimental conduct means any actual or threatened conduct that could cause a detriment to the whistleblower as a result of the whistleblower making a disclosure, including:

- termination of employment;
- harassment, bullying or intimidation;
- personal or financial disadvantage;
- unlawful discrimination;
- harm or injury, including psychological harm;
- damage to reputation; or
- any other conduct that constitutes retaliation.

BBM Youth Support will take all reasonable steps to protect the whistleblower from detrimental conduct and will take action it considers appropriate where such conduct is identified.

BBM Youth Support also strictly prohibits all forms of detrimental conduct against people who are involved in an investigation of a disclosure in response to their involvement in that investigation. Disclosures made under this Policy will be documented and investigated promptly.

BBM Youth Support takes all reports of potential wrongdoing seriously.

All reports will be assessed and, based on the nature and circumstances of the disclosure, a decision made as to whether an investigation is required. For example, reports of potential

wrongdoing of a minor nature that can be resolved informally will typically not require the same level of response as disclosures involving a large-scale and complex investigation.

Any investigation will be conducted in a timely, fair and objective manner, and independent from any persons to whom the report relates. Investigations will generally be overseen by the compliance officer.

Other people, including employees or external advisers, may also be asked to assist or run the investigation. Where possible, the person reporting the wrongdoing will be informed how BBM Youth Support is responding to their report, including whether an investigation will be conducted.

Unless there are confidentiality or other reasons not to do so, employees who are the subject of a report of wrongdoing will be informed of the matters raised in the report at an appropriate time, and will be given a chance to respond to any allegations made against them. They will also be advised of the outcome of any investigation.

Resources:

Whistleblower rights and protections: <https://asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/whistleblower-rights-and-protections/>

Policy Information

Version	2
Approved	2021
Amended	
Reviewed	23/3/2023
Review frequency	Biennial
Responsible position	CEO